

DO NOT WRITE COPY ORIGINAL

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

RECEIVED

JUN 30 1994

In the Matter of )  
Administration of the ) CC Docket No. 94-100  
North American Numbering Plan ) Phase One

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

REPLY COMMENTS OF  
THE CELLULAR TELECOMMUNICATIONS INDUSTRY ASSOCIATION

The Cellular Telecommunications Industry Association ("CTIA") hereby submits its reply to comments on the Notice of Proposed Rulemaking ("Notice") released April 4, 1994 in the above-captioned proceeding. As CTIA stated in its June 7, 1994 Comments, absent a convincing showing that the Alliance for Telecommunications Industry Solutions ("ATIS") has eliminated all vestiges of LEC dominance by opening its governing board to all industry segments, CTIA supports the Commission's tentative conclusion that NANP administrative functions should be assigned to a new single, non-government entity established by the FCC.

After careful review of the comments in this proceeding, CTIA reaffirms its support for the Commission's proposal to charter a new independent entity -- with a neutral governing board open to all carriers -- to serve as the administrator of the North American Numbering Plan.

No. of Copies rec'd 0+12  
List A B C D E

While ATIS has been quite successful in sponsoring many industry numbering activities, including the Industry Numbering Committee, ATIS also remains closely identified with the LECs who fund its activities and make up its governing board. See Notice at ¶ 15. Even though ATIS membership is open to "all domestic providers of telecommunications services with a plant investment in transport and/or switching equipment",<sup>1</sup> and ATIS has proposed an Oversight Committee open to "all parties with a direct and material interest in [World Zone One] numbering issues",<sup>2</sup> the ATIS governing board remains the preserve of traditional telephone companies. As AirTouch Communications observed in its comments, there is a perception that ATIS' "orientation and perspectives are, and are likely in the future to be, dominated by local exchange carriers, perpetuating the concern of other industry groups that there is little attention to or empathy with their technical and business issues in the allocation of numbering resources."<sup>3</sup>

---

<sup>1</sup>ATIS Comments at 2, n.1.

<sup>2</sup>*Id.*, at 5.

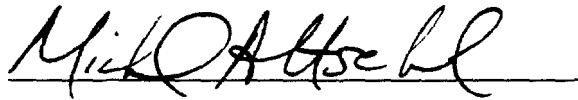
<sup>3</sup>AirTouch Comments at 4. See also, Vanguard Comments at 10("while ATIS recently changed its charter and name to reflect an effort to become more inclusive, it remains a group identified with and dominated by traditional telephone companies").

As CTIA and others repeatedly have observed, the administration of the NANP and the assignment of new numbering resources are of great competitive importance to all segments of the telecommunications industry. Because of the enormous stakes involved in the assignment of new service access codes and other numbering resources, and the need, when appropriate, to deny requests for numbering resources, it is crucial that the administrator be impartial and avoid the appearance of any bias. Review of the ATIS Comments has not eliminated concerns about continued LEC dominance. In an area of such competitive significance, the mere perception of influence by a single industry segment is enough to erode confidence in the numbering body, and generate needless controversy whenever hard choices have to be made.

Accordingly, CTIA believes that the Commission should order the creation of a truly independent numbering policy organization to take over the administration of numbering resources in World Zone One.

Respectfully Submitted,

Cellular Telecommunications  
Industry Association

A handwritten signature in dark ink, appearing to read "Michael F. Altschul", written over a horizontal line.

Michael F. Altschul  
Vice President and  
General Counsel

1250 Connecticut Ave., N.W.  
Suite 200  
Washington, D.C. 20036

June 30, 1994

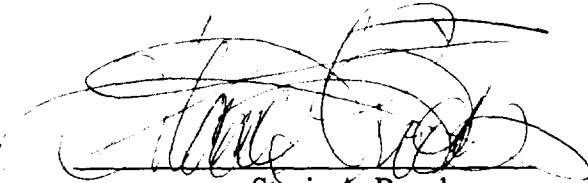
**Certificate of Service**

I, Stacie A. Brooks, hereby certify that on this 30thth day of June, 1994, copies of the foregoing Reply Comments of the Cellular Telecommunications Industry Association were served by hand delivery upon the following parties:

William F. Caton  
Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

International Transcript Service  
1919 M Street, N.W., Room 246  
Washington, D.C. 20554

\*Peyton L. Wynns, Chief  
Industry Analysis Division  
Common Carrier Bureau  
Federal Communications Commission  
1250 23rd Street, N.W., Room 100  
Washington, D.C. 20037



Stacie A. Brooks

\*Indicates by U.S. mail, postage prepaid